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1 without prejudice for further extensions of time by agreement of the parties; and 2 WHEREAS, the parties agree that the deadline for Flagship to respond to the Complaint 3 should be further extended through and including January 24, 2022; 4 **STIPULATION** 5 NOW, THEREFORE, Plaintiff and Flagship hereby stipulate and agree as follows: 6 IT IS STIPULATED AND AGREED that Flagship's response to Plaintiff's Complaint 7 (ECF No. 1) is due by no later than January 24, 2022, without prejudice for further extensions of 8 9 time by agreement of the parties. 10 Dated this 7th day of January, 2022. 11 FOX ROTHSCHILD LLP **COGBURN LAW** Attorneys for Defendant Attorneys for Plaintiff 12 Flagship Credit Acceptance LLC Paul John Carr 13 By: <u>/s/John M. Orr</u> By: /s/ Erik W. Fox 14 MARK J. CONNOT JAMIE S. COGBURN Nevada Bar No. 10010 Nevada Bar No. 8409 15 JOHN M. ORR ERIC W. FOX Nevada Bar. No. 14251 Nevada Bar. No. 8804 16 1980 Festival Plaza Drive, Suite 700 2580 St. Rose Parkway, Suite 330 17 Las Vegas, Nevada 89135 Henderson, Nevada 89074Tel: Tel: 702.262.6899 702.748.7777 18 Fax: 702.597.5503 Fax: 702.966.3880 mconnot@foxrothschild.com 19 jorr@foxrothschild.com IT IS SO ORDERED; provided, 20 however, that any future request Gerald E. Arth 21 for an extension must include a (pro hac vice application forthcoming) specific justification. Steven J. Daroci 22 (pro hac vice application forthcoming Fox Rothschild LLP 23 2000 Market Street, 20th Floor 24 Philadelphia, Pennsylvania 19103 25 Dated: January 7, 2022 26 27 28